

 AUTOMOTIVE INTERFACE SOLUTIONS	Policy Statement BCS Anti-Corruption Policy	PS_11_EN	Revision status: A		
		Page:	1	/	5

Scope:	BCS Automotive Interface Solutions Ltd. and all its entities and affiliates (herein after, the “Company”)	Valid from: 2018-04-30
Subject:	Policy Statement No. 11 Anti-Corruption Policy	
Purpose:	Pursuant to Policy Statement No. 1, it is the policy of the Company to comply fully with all laws governing its operations and to conduct its affairs according to the highest legal and ethical standards. These laws include but are not limited to the German Criminal Code (<i>Strafgesetzbuch</i> – “StGB”) the U.S. Foreign Corrupt Practices Act (“FCPA”) the U.K. Bribery Act (the “UKBA”), and laws of other countries prohibiting bribery. The purpose of this policy is to provide more specific guidance, including guidance on certain contacts with Government Officials to assist employees in fulfilling their responsibilities under Policy Statement No. 1. As used in this policy, the term “Company” includes BCS and its U.S. and non-U.S. subsidiaries.	
Author:	Simon Schwarz	
Verification:	Sven Hassler Gregor Tschernjavski Tom Goodall	
Release acc. D_L_01_EN:	KK Yuan	

 AUTOMOTIVE INTERFACE SOLUTIONS	Policy Statement BCS Anti-Corruption Policy	PS_11_EN	Revision status: A		
		Page:	2	/	5

Statement of Policy

Bribes, kickbacks and other improper “payments”, which can be anything of value or any financial or other advantage, are prohibited.

No officer, employee or agent of the Company or any third party acting on the Company’s behalf shall, either directly or through an intermediary, offer, promise or give anything of value, including money, gifts, entertainment, travel or any financial or other advantage, to or for the benefit of:

- (A) any Government Official (as defined below), for the purpose of either influencing such person in his or her official capacity or securing an improper advantage, in order to assist the Company or any of its joint ventures in obtaining or retaining business or an advantage in conducting such business; or**
- (B) any other person (i) to induce such person to improperly perform a function or activity in the course of such person’s employment or otherwise in connection with a business, (ii) to reward such person for such improper performance, or (iii) when acceptance of the offer would itself constitute such improper performance. For these purposes, “improper performance” refers to a failure to act in good faith, impartially, and in accordance with a position of trust.**

The only “payments” to Government Officials or persons other than Government Officials that are permitted under this policy are the “payments” to non-U.S. Government Officials or persons other than Government Officials described below:

- 1.** The Company’s promotional items and gifts of nominal value (other than money) may be given, and modest meals or entertainment may be provided, if such gifts, meals and entertainment are: (A) infrequent; (B) permissible under written local law and under local custom; (C) given openly and not secretly, and (D) not offered or given with the intention of securing any improper advantage.
- 2.** The Company may pay expenses, including modest meals or entertainment, if they are (A) reasonable, proportionate and bona fide expenditures directly related to the promotion, demonstration or explanation of the Company’s products or business or to the execution or performance of a contract, and (B) not offered, promised or given with the intention of securing any improper advantage.
- 3.** “Payments” to Government Officials that are permitted under this subsection must be reviewed with extraordinary diligence, should be made restrainedly and only in exceptional cases.

 AUTOMOTIVE INTERFACE SOLUTIONS	Policy Statement BCS Anti-Corruption Policy	PS_11_EN	Revision status: A		
		Page:	3	/	5

The making of any Facilitation Payment (as defined below) is prohibited, consistent with the prohibitions that exist in the laws of many countries, including the U.K.'s Bribery Act 2010. "Facilitation Payments" are payments to Government Officials not required by law, with the purpose of inducing the Government Official to accelerate or carry out an official act to which a right principally exists. **No officer or employee of the Company shall, either directly or through an intermediary, request, agree to receive or accept anything of value, including money, gifts, entertainment, travel or any financial or other advantage from any third party when (i) such person's function or activity in the course of employment or otherwise in connection with the Company's business could be improperly performed as a consequence, (ii) receipt would reward such person for the improper performance of such function or activity, or (iii) the request, agreement or acceptance itself would constitute the improper performance of such function or activity. For these purposes, "improper performance" refers to a failure to act in good faith, impartially, or in accordance with a position of trust.**

Policy Statement No. 8 Provides Further Guidance

This policy does not prohibit giving and receiving promotional gifts of nominal value or customary and appropriate hospitality under the proper circumstances. Provided that a situation complies with the provisions of this policy, refer to Company Policy Statement No. 8, "Entertainment, Gratuities and Other Courtesies" for further guidance on when entertainment, gifts and other courtesies may be provided to present and prospective customers or received from present or prospective suppliers or other service providers.

Definitions

The term "Government Official" includes any one of the following, regardless of rank:

- an officer or employee of a government or a governmental department, agency or instrumentality;
- an officer or employee of a government owned or controlled entity or company;
- a political party, party official, or candidate for political office;
- a member of a military;
- an officer or employee of a public international organization (such as the United Nations or the World Bank);
- an officer or employee of the European Union or an institution of the European

 AUTOMOTIVE INTERFACE SOLUTIONS	Policy Statement BCS Anti-Corruption Policy	PS_11_EN	Revision status: A		
		Page:	4	/	5

Union (such as the European Commission, the European Central Bank, the European Court of Auditors, the Court of Justice of the European Union);or

- any agent of, or other person acting in an official capacity for or on behalf of, any of the foregoing.

The term "Associated Person" means a person who performs services for or on behalf of the Company. This can include agents, consultants, subsidiaries, joint ventures and others.

Additional Guidance Regarding Business Partners

Under anti-bribery laws, the Company can be held responsible for improper payments made by intermediaries and other Associated Persons. For this reason, in selecting joint venture partners, distributors, agents and other service providers, a reasonable investigation should be conducted regarding such party's qualifications, expertise, integrity and relationships with Government Officials. Such steps should include (A) appropriate due diligence prior to entering into transactions with such parties and (B) appropriate representations, warranties and ongoing covenants regarding compliance with the FCPA, the UKBA and similar laws in applicable contracts. Appropriate due diligence as described in (A) above must include a denied party screening as well as a Red Flag review. Denied party screening requests can be sent to the Chief Financial Officer. Contact the BCS Business Development Department (**global.helpline@bcs-ais.com**) for required contract provisions as described in (B) above.

Penalties for Violations

Violations of anti-bribery laws are punishable by severe monetary penalties (which, in some cases, have no specified maximum fine amount), debarment from certain public contracts and imprisonment. These laws have proliferated throughout many countries and have generally become stricter over time. There has also been a massive increase in the enforcement of these laws and increased cooperation between government agencies of different countries in investigating these activities.

Questions

Any questions regarding this policy or its application to any proposed transaction should be directed to the BCS Business Development Department (**global.helpline@bcs-ais.com**).

 AUTOMOTIVE INTERFACE SOLUTIONS	Policy Statement BCS Anti-Corruption Policy	PS_11_EN	Revision status: A		
		Page:	5	/	5

Revision Changes

Rev. #	Revision Date	Author	Comments
A	30 April 18	Simon Schwarz	New release